

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JENNAYA BENNETT-WERRA,	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:20-cv-10017-ADB
	)	
STEVEN TOMPKINS, et al.,	)	
Defendants	)	
	)	

**MOTION TO ENLARGE TIME BY DEFENDANTS**

Defendants Sheriff Steven Tompkins, Yolanda Smith, Zezinha Mitchell, Jennifer Sullivan and Christina Ruccio, respectfully request that the time for responding to the Plaintiff's complaint be enlarged up to and including **June 30, 2020**.<sup>1</sup>

1. On January 3, 2020, the Plaintiff, a *pro se* inmate, filed a Complaint, asserting a violation of her rights under the Americans with Disability Act, the Rehabilitation Act, and Civil Rights violations pursuant to 42 U.S.C. § 1983. The Plaintiff also asserts claims under the Massachusetts State Constitution.
2. On May 21, 2020, the Defendants were served with the Plaintiff's complaint.<sup>2</sup>
3. This case was recently assigned to counsel who requires additional time to evaluate the Plaintiff's medical records, and assess the allegations in her Complaint.

**WHEREFORE**, the Defendants request that this Court allow their Motion for an extension of time to respond to the Plaintiff's Complaint until June 30, 2020.

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<sup>1</sup> This is the date the Court allowed co-defendant NaphCare, Inc., to file its response.

<sup>2</sup> The Defendants were not served with the Plaintiff's Amended Complaint which was docketed by the Court on April 8, 2020.

Respectfully submitted,  
By Attorney,  
MAURA HEALEY  
ATTORNEY GENERAL  
Allen H. Forbes  
Special Assistant Attorney General

/s/ Melissa J. Garand  
Melissa J. Garand  
Assistant General Counsel  
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Date: May 27, 2020

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this date. I also certify that on May 27, 2020, I sent a paper copy to the Plaintiff, Jennaya Bennett-Werra at the Suffolk County House of Correction, 20 Bradston Street, Boston, MA 02118.

/s/ Melissa J. Garand  
Melissa J. Garand